

EXHIBIT A

Mister Softee Franchise LLC
901 E. Clements Bridge Road
Runnemede NJ 08078

05/19/2014

Account No: 1300-73M

Invoice No: 47816

Attn: John Conway

1

Dimitrios "Jimmy" Tsirkos

Fees

			Rate	Hours	
03/07/2014	FR	Draft summary for court; draft notice of termination for Ro-Fi Depot Agreement.		0.50	n/c
03/24/2014	FR	Telephone with witness; file Affidavit of Service.		0.60	n/c
03/25/2014	FR	Review Affidavit of Service; email to/from local counsel.		0.50	n/c
04/08/2014	FR	Telephone with opposing counsel; edit preliminary injunction motion; several emails to/from local counsel.	340.00	1.60	544.00
04/15/2014	JZ	Investigate ownership of "Master" Softee trucks.	400.00	0.90	360.00
	FR	Several emails to/from client and opposing counsel; draft injunction motion.	340.00	3.70	1,258.00
04/16/2014	JZ	Draft preliminary injunction motion.	400.00	0.50	200.00
	FR	Draft preliminary injunction motion; review order for pretrial conference; several emails to/from local counsel.	340.00	2.30	782.00
04/17/2014	FR	Edit Affidavit in support of Motion; several emails to/from local counsel.	340.00	0.50	170.00
	JZ	Draft injunction motion.	400.00	0.50	200.00
04/18/2014	JZ	Draft motion.	400.00	2.00	800.00
	FR	Draft Conway affidavit.	340.00	0.50	170.00
04/21/2014	JZ	Draft injunction motion.	400.00	2.00	800.00
	FR	Edit Preliminary Injunction Motion and Brief Motion.	340.00	2.80	952.00
04/22/2014	JZ	Draft injunction motion and brief.	400.00	1.00	400.00
	FR	Draft Certification of Conway; draft Proposed Order; email to local counsel; prepare motion to be filed.	340.00	1.40	476.00
04/23/2014	FR	Email to/from local counsel.	340.00	0.20	68.00
04/24/2014	FR	Draft Motions for admission to practice in NY; several emails to opposing counsel. (N/C)		1.00	n/c
04/25/2014	FR	Review court order; serve motion on opposing counsel; several emails to/from opposing counsel.	340.00	0.40	136.00
04/28/2014	JZ	Prepare for hearing.	400.00	0.80	320.00
04/29/2014	JZ	Prepare for hearing; telephone with Jimmy's lawyer re: settlement.	400.00	1.80	720.00
	FR	Prepare Deposition Questions.	340.00	0.50	170.00
04/30/2014	FR	Draft Deposition Notice; email to/from opposing counsel; prepare deposition questions; email to/from local counsel.	340.00	2.80	952.00
	JZ	Draft deposition questions/notices.	400.00	1.50	600.00

Mister Softee Franchise LLC

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Dimitrios "Jimmy" Tsirkos

2

	Rate	Hours	
For Current Services Rendered		27.70	10,078.00
Minus Courtesy Credit per JZ			-3,000.00
Net Fees After Discount			7,078.00

Expenses

03/21/2014	* Processor Fee: American Express - United Process Service NY,NY	225.00
04/01/2014	* Online Legal Research: Thomson Reuters - West - Invoice# 829286066	128.67
04/18/2014	* Outside Professional/Expert Fees: Adler Vermillion & Skocilich - Invoice# 432	1,560.00
	Total Expenses	1,913.67
	Total Current Work	8,991.67
	Balance Due	<u>\$8,991.67</u>

A finance charge of 1.5% per month will be assessed
on all accounts past due 30 days.

Mister Softee Franchise LLC
901 E. Clements Bridge Road
Runnemede NJ 08078

06/06/2014

Account No: 1300-73M

Invoice No: 48183

Attn: John Conway

3

Dimitrios "Jimmy" Tsirkos

Previous Balance

\$8,991.67

Fees

			Rate	Hours	
05/01/2014	JZ	Prepare for injunction hearing and deposition.	400.00	2.50	1,000.00
	FR	Draft Deposition outlines; draft preliminary injunction argument outline; email to/from client.	340.00	2.20	748.00
05/02/2014	JZ	Telephone with defendant's lawyer; prepare for deposition.	400.00	1.50	600.00
	FR	Review answer/ counter claims of Jimmy.	340.00	0.50	170.00
05/05/2014	JZ	Review affidavit; conference call re: same and depositions.	400.00	1.00	400.00
	FR	Telephone with local counsel re: Adjournment letter; email to/from opposing counsel.	340.00	0.60	204.00
05/06/2014	JZ	Prepare for depositions; review affidavit.	400.00	1.50	600.00
	FR	Review opposition to our motion.	340.00	0.60	204.00
05/07/2014	JZ	Prepare for attend depositions of J. Tsirkos, C. Zoly and J. Spalarias.	400.00	6.00	2,400.00
	FR	Research issues raised in opposition brief; draft reply brief.	340.00	4.50	1,530.00
05/08/2014	JZ	Draft reply brief; draft Affidavits of J. Conway and P. Bouziatis.	400.00	5.00	2,000.00
	FR	Draft Affidavit of client; draft reply brief; telephone with client; research issues related to Ray and Jimmy's disclosure defense.	340.00	7.50	2,550.00
05/09/2014	JZ	Draft reply brief; draft affidavits of J. Conway and P. Bouzitas.	400.00	2.80	1,120.00
	FR	Draft reply brief; research reply brief issues; file reply brief; telephone with local counsel.	340.00	5.00	1,700.00
05/13/2014	JZ	Prepare for hearing; calls and emails re: same.	400.00	2.00	800.00
	FR	Email to opposing counsel; research issues related to Jimmy's disclosure defense.	340.00	1.80	612.00
05/14/2014	JZ	Settlement discussions; prepare for hearing.	400.00	2.50	1,000.00
	FR	Draft supplemental Affidavit with non-compete parameters and map; prepare for hearing; letter to court; review court order; several emails to clients; email to/from landlord.	340.00	5.80	1,972.00
05/15/2014	JZ	Prepare for and attend settlement conference; travel.	400.00	8.00	3,200.00
	FR	Calculate potential risk.	340.00	0.60	204.00
05/19/2014	FR	Draft answer to counter claim; several emails to/from client.	340.00	2.80	952.00
05/20/2014	JZ	Draft answer to counter claims.	400.00	0.80	320.00
	FR	Draft supplemental brief on rescission issue.	340.00	1.70	578.00
05/21/2014	JZ	Draft answer and defenses to counterclaim; research defenses to disclosure violation claim.	400.00	1.50	600.00
	FR	Letter to court; research NY Franchise Sales Act/legislative history.	340.00	4.50	1,530.00

Mister Softee Franchise LLC

06/06/2014

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Dimitrios "Jimmy" Tsirkos

4

			Rate	Hours	
05/22/2014	JZ	Research defenses to disclosure violation claim; draft supplemental brief; prepare for May 28th hearing.	400.00	1.60	640.00
	FR	Draft letters to court regarding hearing; draft supplemental brief; research legislative history of NY Franchise Sales Act; email to client.	340.00	5.00	1,700.00
05/23/2014	JZ	Prepare for hearing.	400.00	3.00	1,200.00
	FR	Prepare for hearing; letter to court; review letter from opposing counsel; file answer to counter claim.	340.00	1.50	510.00
	FR	Prepare for hearing; draft brief.	340.00	1.50	510.00
05/27/2014	JZ	Travel to NY. (No charge)		3.00	n/c
	JZ	Prepare for hearing; draft supplemental brief re: non-compete issues; conference call with PB, JS and CZ.	400.00	3.00	1,200.00
	FR	Draft brief; prepare for hearing; email to client.	340.00	3.80	1,292.00
	JND	Research effect of Tsirkos' termination/ abandonment on right to rescind a contract.	250.00	1.50	375.00
05/28/2014	JZ	Prepare for and prepare witnesses for hearing; attend evidentiary hearing before Judge Swain.	400.00	4.00	1,600.00
	JZ	Travel back to NJ. (No charge)		3.00	n/c
	FR	Research Franchise Sales Act.	340.00	0.20	68.00
05/29/2014	FR	File supplemental brief; review opposition transcripts.	340.00	0.80	272.00
05/30/2014	FR	Letter to court.	340.00	0.50	170.00
		For Current Services Rendered		99.60	36,531.00

Expenses

05/01/2014	• Online Legal Research: Thomson Reuters - West - Invoice #829475801	24.87
05/01/2014	• Online Legal Research: Thomson Reuters - West - Invoice #829475801	257.03
05/06/2014	• Frank Reino - Fedex Office	11.21
05/09/2014	• Transcription fees: Pirozzi & Hillman - Invoice #:24210	712.75
05/15/2014	Outside Professional/Expert Fees: Adler Vermillion & Skocilich - Invoice# 446	1,820.00
	Total Expenses	2,825.86
	Total Current Work	39,356.86
	Balance Due	<u>\$48,348.53</u>

A finance charge of 1.5% per month will be assessed
on all accounts past due 30 days.

Mister Softee Franchise LLC
901 E. Clements Bridge Road
Runnemede NJ 08078

07/09/2014

Account No: 1300-73M

Invoice No: 48540

Attn: John Conway

5

Dimitrios "Jimmy" Tsirkos

Previous Balance

\$48,348.53

Fees

			Rate	Hours	
06/02/2014	FR	Review reply brief filed by Tsirkos.	340.00	0.60	204.00
06/03/2014	FR	Draft pretrial statement.	340.00	4.50	1,530.00
	JZ	Review transcript of injunction hearing.	400.00	0.40	160.00
06/05/2014	FR	Review court order and opinion.	340.00	0.80	272.00
06/06/2014	FR	Review court order and opinion emails to client regarding order; several telephone conferences with and emails to/from bond office.	340.00	1.80	612.00
		Email to/from opposing counsel; edit pretrial statement.	250.00	0.50	125.00
	JND	Phone call and email with PI Darrin Giglio re: Master Softee Case.	400.00	3.50	1,400.00
	JZ	Coordinate with private investigator.	400.00	1.00	400.00
	JZ	Attention to bond issue.			
06/07/2014	JZ	Coordinate with PI.	400.00	1.00	400.00
06/08/2014	JZ	Coordinate with PI.	400.00	0.50	200.00
06/10/2014	FR	Review notice from court regarding pretrial conference.	340.00	0.10	34.00
06/11/2014	JZ	Draft contempt motion.	400.00	0.50	200.00
	FR	Draft motion package; research contempt issues; several emails to/from opposing counsel.	340.00	6.00	2,040.00
	JND	Call with PI regarding findings, send affidavit for photographer.	250.00	0.25	62.50
06/12/2014	FR	Edit contempt motion; telephone with Judge's clerk; file contempt motion; emails to/from local counsel; telephone with local counsel.	340.00	2.80	952.00
06/13/2014	JZ	Telephone with J. Tsirkos' lawyer re: return of music boxes, menu, boards and continuing violations of the order; arrange for photos during weekend of June 14-15.	400.00	0.40	160.00
	FR	Email to/from opposing counsel; review edits of pretrial statement from opposing counsel; prepare and file final pretrial statement.	340.00	2.30	782.00
06/16/2014	JZ	Correspondence with Judge Swain re: contempt hearing; revise PI affidavit.	400.00	0.70	280.00
	FR	Draft affidavit of photographer; draft letter to court; several emails to/from photographer; telephone with photographer; file affidavit.	340.00	3.30	1,122.00
06/18/2014	JND	Call with PI to ask them to run a license plate of an infringing truck.	250.00	0.20	50.00
06/19/2014	JZ	Coordinate with photographer re: Tsirkos' continuing order violations.	400.00	0.50	200.00
06/20/2014	FR	Draft affidavit of Michael Paul; several emails to/from Michael Paul.	340.00	1.80	612.00

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07/09/2014

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Dimitrios "Jimmy" Tsirkos

6

			Rate	Hours	
06/23/2014	JZ	Prepare for contempt hearings; research re: Tsirkos' defense; draft supporting affidavits.	400.00	3.00	1,200.00
	JZ	Travel to NY for hearing (N/C).	400.00	4.00	1,600.00
	FR	Draft affidavit for photographers of Jimmy's trucks over the weekend. Prep one file for hearing; email to/from Peter Bouziotis; several emails to/from photographer; research plates of trucks in photographs; file affidavits.	340.00	6.00	2,040.00
06/24/2014	JZ	Prepare for and attend contempt hearing; draft letter to Judge Swain.	400.00	3.50	1,400.00
	JZ	Travel NY to NJ.	400.00	4.00	1,600.00
	FR	Draft letter to court with color copies of exhibits; analyze trucks to determine which belong to Jimmy.	340.00	2.50	850.00
06/25/2014	JZ	Correspondance with Judge Swain; draft supplemental affidavits.	400.00	1.20	480.00
	FR	Draft letter to court; draft affidavits; telephone with court reporter; complete transcript order form.	340.00	4.40	1,496.00
06/26/2014	FR	Email to/from opposing counsel; telephone with court; review transcript.	340.00	0.90	306.00
06/27/2014	FR	Review scheduling order from court; email to/from opposing counsel.	340.00	1.20	408.00
06/30/2014	FR	Email to/from opposing counsel; Review emails from investigator and photographers; Research infringing truck spotted on Sunday.	340.00	1.80	612.00
		For Current Services Rendered		65.95	23,789.50

Expenses

06/02/2014	• Transcription fees: Southern District Reporters P.C. - Invoice #0367577-IN	406.26
06/11/2014	• Overnight Delivery/Messenger Services: Worldwide Express - Invoice #1406031926	20.76
06/17/2014	• Photographer: Michael Paul	285.00
06/25/2014	• Michael Paul - Photographs of Tsirkos Truck	500.00
	Total Expenses	1,212.02
	Total Current Work	25,001.52
	Balance Due	<u>\$73,350.05</u>

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on all accounts past due 30 days.

Mister Softee Franchise LLC
901 E. Clements Bridge Road
Runnemede NJ 08078

08/18/2014

Account No: 1300-73M

Invoice No: 49038

Attn: John Conway

7

Dimitrios "Jimmy" Tsirkos

Previous Balance

\$73,350.05

Fees

			Rate	Hours	
06/20/2014	BG	Attn to Master Softee truck and taking pics of the same; attn to email to JZ and FR, re: same and location/time.	325.00	0.20	65.00
07/01/2014	JZ	Review RO-FI depot agreement; Research re: applicability to MSQ; Revise order to include plate and VIN information.	400.00	1.20	480.00
	FR	Research RoFi agreement's non compete issue; Draft modified proposal order.	340.00	3.40	1,156.00
07/02/2014	JZ	Review opinion on contempt motion; Coordinate with PI re: further violations; Settlement emails.	400.00	1.40	560.00
	FR	Draft letter to court; File letter; Review order from court; Email to landlord.	340.00	1.60	544.00
07/03/2014	JZ	Obtain plate numbers from VINs; Coordinate with PI for surveillance.	400.00	1.30	520.00
07/07/2014	JZ	Prepare fee and cost statement for contempt motion	400.00	1.00	400.00
	JZ	Attention to further order violations over July 5th and 6th.	400.00	1.00	400.00
	FR	Attention to investigation of Tsirkos' trucks; Draft fees affidavit.	340.00	3.40	1,156.00
07/08/2014	JZ	Draft contempt motion; Run plates and VINs.	400.00	1.50	600.00
07/09/2014	JZ	Attention to 2nd order violations; Draft second contempt motion and affidavits.	400.00	1.00	400.00
	FR	Draft contempt motion; Email to and from opposing counsel and local counsel.	340.00	5.20	1,768.00
07/10/2014	JZ	Draft motion for contempt #2; Draft brief and affidavits.	400.00	1.00	400.00
	FR	Draft contempt motion; Telephone and email to and from investigator; Termination letters to franchisees parking at Jimmy's depot.	340.00	4.70	1,598.00
07/11/2014	JZ	Final revisions to contempt motion #2.	400.00	1.50	600.00
	FR	Telephone with local counsel; File contempt motion; Edit contempt motion; Review request from private investigator.	340.00	4.70	1,598.00
07/14/2014	GK	Attorney conference with Frank Reino re: case background and litigation strategy.	325.00	0.50	162.50
	FR	Several emails to and from opposing counsel; Draft letter motion to court.	340.00	1.00	340.00
07/15/2014	FR	Draft stipulated motion to extend deadline to file amended pleadings.	340.00	0.80	272.00
07/16/2014	FR	File affidavits for fees application.	340.00	0.30	102.00

Mister Softee Franchise LLC

08/18/2014

Account No: 1300-73M

Invoice No: 49038

Dimitrios "Jimmy" Tsirkos

8

06/18/2014	• Overnight Delivery/Messenger Services: Worldwide Express - Invoice # 1406063606	16.78
06/26/2014	• Transcription fees: Southern District Reporters P.C. - Invoice # 0370905-IN	206.46
07/01/2014	• Outside Professional/Expert Fees: Adler Vermillion & Skocilich - Invoice #469	1,000.00
07/01/2014	Online Legal Research: Thomson Reuters - West - Invoice # 829850596	1,205.97
07/01/2014	Online Legal Research: Thomson Reuters - West - Invoice # 829850596	363.88
07/01/2014	• Outside Professional/legal Fees: Adler Vermillion & Skocilich - Invoice #469	40.00
07/02/2014	• Overnight Delivery/Messenger Services: Worldwide Express - Invoice #1407000864	19.91
07/03/2014	• Online Legal Research: Pacer Service Center - Invoice # LF0066-Q22014	0.20
07/03/2014	Online Legal Research: Pacer Service Center - Invoice # LF0066-Q22014	13.10
07/03/2014	Online Legal Research: Pacer Service Center - Invoice # LF0066-Q22014	2.50
07/03/2014	Online Legal Research: Pacer Service Center - Invoice # LF0066-Q22014	16.90
07/03/2014	Online Legal Research: Pacer Service Center - Invoice # LF0066-Q22014	1.90
07/03/2014	Online Legal Research: Pacer Service Center - Invoice # LF0066-Q22014	13.60
07/03/2014	Online Legal Research: Pacer Service Center - Invoice # LF0066-Q22014	5.20
07/03/2014	Online Legal Research: Pacer Service Center - Invoice # LF0066-Q22014	7.90
07/03/2014	Online Legal Research: Pacer Service Center - Invoice # LF0066-Q22014	5.10
07/03/2014	Online Legal Research: Pacer Service Center - Invoice # LF0066-Q22014	5.30
07/03/2014	Online Legal Research: Pacer Service Center - Invoice # LF0066-Q22014	17.20
07/03/2014	Online Legal Research: Pacer Service Center - Invoice # LF0066-Q22014	3.40
07/03/2014	Online Legal Research: Pacer Service Center - Invoice # LF0066-Q22014	12.90
07/03/2014	Online Legal Research: Pacer Service Center - Invoice # LF0066-Q22014	3.40
07/03/2014	• Online Legal Research: Pacer Service Center - Invoice # LF0066-Q22014	13.40
07/09/2014	• Overnight Delivery/Messenger Services: Worldwide Express - Invoice #1407032580	21.18
	Total Expenses	8,075.19
	Total Current Work	35,290.19
	Balance Due	<u>\$108,640.24</u>

A finance charge of 1.5% per month will be assessed
on all accounts past due 30 days.

Mister Softee Franchise LLC

08/18/2014

Account No: 1300-73M

Invoice No: 49038

Dimitrios "Jimmy" Tsirkos

9

			Rate	Hours	
07/17/2014	FR	Telephone call with insurance company; Review affidavits in opposition to contempt motion.	340.00	1.00	340.00
	GK	Review complaint, answer with counterclaims, preliminary injunction order, preliminary injunction opinion, contempt petition, contempt order.	325.00	1.10	357.50
	JZ	Review affidavits and opposition to contempt motion #2.	400.00	1.00	400.00
07/18/2014	FR	Email to and from opposing counsel; Review opposition to motion filed by Tsirkos; Telephone with Tsirkos' insurance agent; Email to and from client.	340.00	1.00	340.00
07/21/2014	JZ	Review affidavits; Review P.I. findings; Analyze business records and truck sale records.	400.00	1.50	600.00
	FR	Draft reply contempt brief; Telephone with opposing counsel; Email to and from opposing counsel; Draft affidavit of Jim Conway.	340.00	2.80	952.00
07/22/2014	JZ	Draft reply to Tsirkos' opposition to our contempt motion; Review P.I. report.	400.00	2.00	800.00
	FR	Draft brief; Edit brief; Prepare brief for filing; Draft letter to court; Email to opposing counsel.	340.00	3.60	1,224.00
07/23/2014	JZ	Attention to Tsirkos' opposition to our motion; Prepare for hearing.	400.00	1.00	400.00
	FR	Email to client.	340.00	0.30	102.00
07/25/2014	JZ	Prepare for contempt hearing #2.	400.00	0.80	320.00
07/28/2014	FR	Draft argument outline; Draft supplemental affidavit; Research sale of trucks issue.	340.00	4.50	1,530.00
	JZ	Prepare for contempt hearing #2; Research re: adverse inference as a result of Tsirkos' lack of evidence of sales.	400.00	1.00	400.00
07/29/2014	FR	Draft affidavit; Email to and from opposing counsel; Telephone with opposing counsel; Prepare argument outline and research issues for contempt hearing.	340.00	5.00	1,700.00
	JZ	Prepare for contempt hearing #2; Draft supplemental affidavit.	400.00	1.50	600.00
07/30/2014	JZ	Prepare for hearing; Review comparable truck sales to dispute Tsirkos' evidence of sales; Draft supplemental affidavit of Frank Reino.	400.00	2.80	1,120.00
	FR	Prepare argument outline; Draft affidavit on judgement of contempt motion; Email to opposing counsel; Telephone with opposing counsel.	340.00	3.20	1,088.00
07/31/2014	JZ	Draft summary of position for use by court at contempt hearing; Prepare for hearing; Research re: adverse inference.	400.00	2.00	800.00
	FR	Prepare file for argument; Edit argument outline; Draft amended complaint.	340.00	3.00	1,020.00
		For Current Services Rendered		75.80	27,215.00

Expenses

06/01/2014	• Online Legal Research: Thomson Reuters - West - Invoice #829653956	3,989.31
06/01/2014	• Online Legal Research: Thomson Reuters - West - Invoice #829653956	1,089.70

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09/15/2014

Account No: 1300-73M

Invoice No: 49413

Attn: John Conway

10

Dimitrios "Jimmy" Tsirkos

Previous Balance

\$108,640.24

Fees

			Rate	Hours	
08/01/2014	JZ	Prepare for and attend contempt hearing #2.	400.00	4.00	1,600.00
	JZ	Travel back to PHL. (N/C)		4.00	n/c
	FR	Draft motion to amend complaint; File motion to amend complaint.	340.00	1.80	612.00
08/04/2014	FR	Draft local counsel fees affidavit for contempt motion; Review orders for court.	340.00	1.60	544.00
	JZ	Research re: Lance-T Corp and ownership of trucks.	400.00	0.50	200.00
08/05/2014	JZ	Attention to attorney's fee claim; Letter to Judge Swain.	400.00	0.20	80.00
	FR	Letter to court.	340.00	0.50	170.00
08/06/2014	FR	Email to and from opposing counsel; Telephone with opposing counsel.	340.00	0.30	102.00
08/07/2014	FR	Draft fees application.	340.00	1.20	408.00
08/08/2014	FR	Draft fees application.	340.00	0.80	272.00
08/11/2014	JZ	Draft affidavit for arrest warrant; Review affidavit and exhibits filed by Tsirkos.	400.00	1.00	400.00
	FR	Draft affidavit for fees application.	340.00	1.00	340.00
08/12/2014	JZ	Review and analyze affidavit and support for retail sales and sales of trucks; Draft opposing affidavit.	400.00	0.90	360.00
	FR	Review Jimmy's affidavit; Compare Jimmy's prior affidavit to the new affidavit. Calculate profits due to Mister Softee.	340.00	5.00	1,700.00
08/13/2014	JZ	Draft affidavit re: arrest for contempt.	400.00	0.40	160.00
08/14/2014	JZ	Draft affidavit in support of arrest.	400.00	1.00	400.00
	FR	draft and edit affidavit for profits.	340.00	1.80	612.00
08/15/2014	FR	Draft motion to enter judgement pursuant to contempt orders; Review memo in opposition to court fees request.	340.00	4.50	1,530.00
08/18/2014	FR	Research fees issues; Draft fees issue brief.	340.00	1.00	340.00
08/19/2014	FR	Draft memo to court for judgement of profits; Draft reply memo to Tsirkos' opposition to attorney fees request.	340.00	5.20	1,768.00
08/21/2014	FR	Edit motion for judgement on contempt orders; Letter to court.	340.00	1.20	408.00
	FR	Edit brief in support of fee application.	340.00	0.50	170.00
	JZ	Draft motion to enter judgement for profits, attorney's and PI fees.	400.00	0.80	320.00
08/22/2014	FR	Email to client.	340.00	0.50	170.00

Mister Softee Franchise LLC

09/15/2014

Account No: 1300-73M

Invoice No: 49413

Dimitrios "Jimmy" Tsirkos

11

			Rate	Hours	
08/28/2014	FR	Review file; Email to client.	340.00	0.20	68.00
		For Current Services Rendered		35.90	12,734.00

Expenses

06/13/2014	• Travel Expense: American Express - NYC Taxi	20.00
06/13/2014	• Travel Expense: American Express - NJT Hamilton	15.00
06/13/2014	• Travel Expense: American Express - Hamilton Station	7.00
06/13/2014	• Travel Expense: American Express - Amtrak Quik Trak	41.00
06/13/2014	• Travel Expense: American Express - Station Plza Pkng	24.50
06/13/2014	• American Express - Uber Technologies	24.00
06/13/2014	• Travel Expense: American Express - New York Marriott	408.21
06/13/2014	• Travel Expense: American Express - Verifone Transportation	9.34
06/13/2014	• Travel Expense: American Express - Verifone Transportation	9.64
07/14/2014	• American Express - Kmart 07749	9.99
07/14/2014	• Travel Expense: American Express - Amtrak - Ticket # ending in - 0665	59.00
07/14/2014	• Travel Expense: American Express - Boulevard Taxi	31.70
07/14/2014	• American Express - Uber Uber	25.00
07/14/2014	• Travel Expense: American Express - Station Plza Parking	18.00
07/14/2014	• Travel Expense: American Express - Amtrak - Ticket # ending in -9728	59.00
07/14/2014	• Travel Expense: American Express - VTS NYC - Taxi	12.50
07/14/2014	• Travel Expense: American Express - New York Marriott	537.39
07/14/2014	• Filing Fee: American Express - Southern District	206.46
07/30/2014	• Overnight Delivery/Messenger Services: Worldwide Express - Invoice #1407126700	17.20
07/30/2014	• Travel Expense: American Express - Amtrak Internet Sales	72.00
07/31/2014	• Travel Expense: American Express - UBER UBER	33.89
07/31/2014	• Travel Expense: American Express - Amtrak Quik Trak	72.00
07/31/2014	• Travel Expense: American Express - Amtrak Quik Trak	61.00
07/31/2014	• Travel Expense: American Express - Trenton Kiosk	5.96
07/31/2014	• Travel Expense: American Express - USA Snack Soda Vendor	2.75
08/01/2014	• Online Legal Research: Thomson Reuters - West - Invoice #830036290	120.85
08/01/2014	• Online Legal Research: Thomson Reuters - West - Invoice #830036290	218.71
08/01/2014	• Online Legal Research: Thomson Reuters - West - Invoice #830036290	68.38
08/01/2014	• Online Legal Research: Thomson Reuters - West - Invoice #830036290	21.52
08/01/2014	• Online Legal Research: Thomson Reuters - West - Invoice #830036290	639.04
08/01/2014	• Online Legal Research: Thomson Reuters - West - Invoice #830036290	1,061.14
08/01/2014	• Online Legal Research: Thomson Reuters - West - Invoice #830036290	96.09
08/01/2014	• Online Legal Research: Thomson Reuters - West - Invoice #830036290	34.41
08/01/2014	• Travel Expense: American Express - UBER UBER	57.00
08/01/2014	• Travel Expense: American Express - UBER UBER	13.68
08/01/2014	• Travel Expense: American Express - UBER UBER	39.14
08/01/2014	• Travel Expense: American Express - UBER UBER	32.89
08/01/2014	• Travel Expense: American Express - Station Plaza Parking	28.00
08/01/2014	• Travel Expense: American Express - TGIFriday's	108.18
08/01/2014	• Travel Expense: American Express - Amtrak Quik Trak	164.00
08/01/2014	• Travel Expense: American Express - Amtrak Acela Cafe	14.25
08/01/2014	• Travel Expense: American Express	
08/02/2014	• Travel Expense: American Express - New York Marriott Hotel	579.48
08/06/2014	• Overnight Delivery/Messenger Services: Worldwide Express - Invoice #1408000878	17.20
08/06/2014	• Overnight Delivery/Messenger Services: Worldwide Express - Invoice #1408000878	17.20
08/13/2014	• Overnight Delivery/Messenger Services: Worldwide Express - Invoice #1408032780	17.20
08/13/2014	• Overnight Delivery/Messenger Services: Worldwide Express - Invoice #1408032780	17.20

11

Mister Softee Franchise LLC

09/15/2014

Account No: 1300-73M

Invoice No: 49413

Dimitrios "Jimmy" Tsirkos

12

08/21/2014	* Overnight Delivery/Messenger Services: Worldwide Express - Invoice # 1408096190	17.20
	Total Expenses	5,165.29
07/31/2014	Travel Expense: American Express - Amtrak Quik Trak	-64.80
08/01/2014	Travel Expense: American Express - Amtrak Quik Trak	-64.80
	Total Credits for Expenses	-129.60
	Total Current Work	17,769.69
	Balance Due	<u>\$126,409.93</u>

A finance charge of 1.5% per month will be assessed
on all accounts past due 30 days.

Mister Softee Franchise LLC
 901 E. Clements Bridge Road
 Runnemede NJ 08078

10/07/2014

Account No: 1300-73M

Invoice No: 49796

Attn: John Conway

13

Dimitrios "Jimmy" Tsirkos

Previous Balance

\$126,409.93

Fees

			Rate	Hours	
09/05/2014	FR	Draft discovery demands.	340.00	1.00	340.00
09/12/2014	FR	Prepare discovery responses to Tsirkos' discovery; Email to client;	340.00	2.80	952.00
		Email to and from Pete Bouziotis.	340.00	1.20	408.00
	FR	Draft discovery demands.			
09/17/2014	FR	Draft discovery demands.	340.00	2.80	952.00
09/18/2014	FR	Draft discovery demands; Letter to opposing counsel.	340.00	0.80	272.00
09/23/2014	FR	Review discovery demands sent by Tsirkos.	340.00	0.80	272.00
09/25/2014	FR	Prepare discovery responses; Review discovery demands.	340.00	3.60	1,224.00
		For Current Services Rendered		13.00	4,420.00

Expenses

09/01/2014	•	Online Legal Research: Thomson Reuters - West - Invoice #830222933			1,652.64
09/01/2014	•	Online Legal Research: Thomson Reuters - West - Invoice #830222933			88.02
09/24/2014	•	Overnight Delivery/Messenger Services: Worldwide Express - Invoice #1409096342			17.12
		Total Expenses			1,757.78
		Total Current Work			6,177.78

Balance Due

\$132,587.71

A finance charge of 1.5% per month will be assessed
 on all accounts past due 30 days.

Mister Softee Franchise LLC
901 E. Clements Bridge Road
Runnemede NJ 08078

11/12/2014
Account No: 1300-73M
Invoice No: 50696

Attn: John Conway

14

Dimitrios "Jimmy" Tsirkos

Previous Balance

\$132,587.71

Fees

			Rate	Hours	
10/01/2014	FR	Prepare discovery responses.	340.00	2.50	850.00
10/02/2014	FR	Review Judge's order and \$97,000 judgment against Tsirkos.	340.00	0.50	170.00
10/03/2014	FR	Email to client.	340.00	0.30	102.00
10/06/2014	GK	Garnishing bank Tsirkos' accounts.	325.00	1.90	617.50
10/08/2014	FR	Draft discovery responses.	340.00	3.20	1,088.00
10/09/2014	GK	Execute on Tsirkos bank account.	325.00	1.20	390.00
10/10/2014	GK	Draft interrogatories in aid of execution.	325.00	0.40	130.00
10/13/2014	FR	Prepare discovery responses.	340.00	2.00	680.00
10/14/2014	FR	Prepare discovery responses.	340.00	2.40	816.00
10/15/2014	FR	Prepare discovery responses.	340.00	2.50	850.00
10/16/2014	GK	Draft garnishment questionnaire & related required forms.	325.00	1.60	520.00
	FR	Prepare discovery responses.	340.00	0.80	272.00
10/17/2014	GK	Telephone with U.S. Marshal re: Writ of Execution, procedure, fees, and forms; Prepare Writ of Execution, U.S. Marshal forms, finalize Interrogatories in Aid of Execution; Prepared state court execution documents.	325.00	1.90	617.50
	FR	Prepare discovery responses.	340.00	1.80	612.00
10/20/2014	FR	Prepare discovery responses; Letter to opposing counsel.	340.00	3.50	1,190.00
10/23/2014	FR	Telephone with US Marshal; Email to and from US Marshal; Review return of service for writ; Email to client. (no charge)		1.00	n/c
10/27/2014	FR	Email to and from opposing counsel; Telephone with opposing counsel.	340.00	0.80	272.00
10/28/2014	FR	Email to client.	340.00	0.20	68.00
10/29/2014	GK	Telephone with Alma Bank re: status of Writ of Execution and garnishment.	325.00	0.10	32.50
	FR	Several emails to and from opposing counsel.	340.00	0.50	170.00
10/30/2014	FR	Email to and from opposing counsel; Draft subpoenas for buyers of Tsirkos' truck; Locate addresses.	340.00	1.70	578.00

Mister Softee Franchise LLC

11/12/2014

Account No: 1300-73M

Invoice No: 50696

Dimitrios "Jimmy" Tsirkos

15

		Rate	Hours	
10/31/2014	FR Telephone with opposing counsel; Review letter from opposing counsel.	340.00	1.80	612.00
	For Current Services Rendered		31.60	10,637.50

Expenses

10/01/2014	• Online Legal Research: Thomson Reuters - West - Invoice # 830410954			295.03
10/08/2014	• Overnight Delivery/Messenger Services: Worldwide Express - Invoice # 1410065428			17.12
10/17/2014	Filing Fee: US MARSHAL SERVICE			300.00
10/21/2014	• Overnight Delivery/Messenger Services: It's DONE! Courier - Invoice # 2506			243.75
10/21/2014	• Overnight Delivery/Messenger Services: It's DONE! Courier - Invoice # 2506			243.75
10/22/2014	• Overnight Delivery/Messenger Services: Worldwide Express - Invoice # 1410097660			17.12
10/24/2014	• Supreme Court of Pennsylvania - Certificate of Good Standing for Frank Reino			25.00
10/27/2014	• Overnight Delivery/Messenger Services: It's DONE! Courier - Invoice # 2527			312.50
10/29/2014	• Overnight Delivery/Messenger Services: Worldwide Express - Invoice # 1410130014			51.36
	Total Expenses			1,505.63
	Total Current Work			12,143.13

Payments

Total Payments for 10/15/2014	-108,640.24
Balance Due	<u>\$36,090.60</u>

A finance charge of 1.5% per month will be assessed on all accounts past due 30 days.

Mister Softee Franchise LLC
901 E. Clements Bridge Road
Runnemede NJ 08078

12/04/2014
Account No: 1300-73M
Invoice No: 50766

Attn: John Conway

16

Dimitrios "Jimmy" Tsirkos

Previous Balance \$36,090.60

Fees

			Rate	Hours	
11/03/2014	FR	Email to and from mediator and opposing counsel.	340.00	0.30	102.00
11/04/2014	FR	Several emails to and from opposing counsel.	340.00	0.50	170.00
11/05/2014	GK	Telephone with Alma Bank re: Writ of Execution and Tsirkos bank account.	325.00	0.20	65.00
11/06/2014	FR	Several emails to and from opposing counsel and Marshals office.	340.00	0.50	170.00
11/07/2014	GK	Telephone with Alma Bank re: account status and writ of execution.	325.00	0.10	32.50
	GK	Research required notice for subpoenas to produce documents under federal law.	325.00	0.20	65.00
11/11/2014	GK	Telephone with Alma Bank re: Tsirkos account and Writ of Execution.	325.00	0.10	32.50
	FR	Draft deposition subpoenas for truck buyers.	340.00	1.40	476.00
11/13/2014	FR	Email to and from opposing counsel and local counsels.	340.00	0.40	136.00
11/14/2014	GK	Telephone with Alma Bank re: status of Writ of Execution and Tsirkos account; Telephone with U.S. Marshal re: same.	325.00	0.30	97.50
	FR	Telephone with court; Email to and from local and opposing counsel; Email to client.	340.00	0.40	136.00
11/18/2014	GK	Telephone with U.S. Marshal re: Writ of Execution and check from Alma Bank.	325.00	0.10	32.50
	FR	Emails to and from U.S. Marshal and client.	340.00	0.50	170.00
11/19/2014	FR	Email opposing counsel; Edit subpoenas.	340.00	0.80	272.00
11/24/2014	FR	Attention to service of subpoenas.	340.00	0.50	170.00
		For Current Services Rendered		6.30	2,127.00

Expenses

09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	2.10
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	30.90
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	2.30
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	9.10
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	39.10
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	1.90
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	1.70
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	0.70
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	6.10
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	2.40

Mister Softee Franchise LLC

12/04/2014

Account No: 1300-73M

Invoice No: 50766

Dimitrios "Jimmy" Tsirkos

17

09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	1.40
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	3.20
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	3.40
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	1.90
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	3.00
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	1.50
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	3.00
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	0.30
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	14.20
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	10.30
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	3.50
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	4.20
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	5.40
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	1.60
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	0.10
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	1.70
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	0.10
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	1.10
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	6.20
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	1.20
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	1.40
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	6.80
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	1.70
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	4.90
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	2.40
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	1.50
09/30/2014	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q32014	19.00
11/01/2014	• Online Legal Research: Thomson Reuters - West - Invoice # 830610341	39.33
11/01/2014	• Online Legal Research: Thomson Reuters - West - Invoice # 830610341	626.73
11/01/2014	• Online Legal Research: Thomson Reuters - West - Invoice # 830610341	54.90
11/01/2014	• Online Legal Research: Thomson Reuters - West - Invoice # 830610341	894.85
11/05/2014	• Overnight Delivery/Messenger Services: Worldwide Express - Invoice # 1411000894	17.12
11/19/2014	• Travel Expense: Kiriaki Aravidis - Witness - (7.9 miles @ .56/mile)	4.42
11/19/2014	• Witness Fee: Kiriaki Aravidis	40.00
11/19/2014	• Witness Fee: Dimitrios Konstantakakos	40.00
11/19/2014	• Travel Expense: Dimitrios Konstantakakos - Witness (35 miles @ .56/mile)	19.60
11/19/2014	• Witness Fee: Zaven Kljyan	40.00
11/19/2014	• Travel Expense: Zaven Kljyan - Witness - (30.1 miles @ .56/mile)	16.86
11/19/2014	• Witness Fees: Dimitrios Tzanavalos	40.00
11/19/2014	• Travel Expense: Dimitrios Tzanavalos - Witness - (5.2 miles @ .56/mile)	2.91
11/19/2014	• Witness Fees: Ahmed Elshahat	40.00
11/19/2014	• Travel Expense: Ahmed Elshahat - Witness - (50.1 miles @ .56/mile)	28.06
	Total Expenses	2,106.08
	Total Current Work	4,233.08
	Balance Due	<u>\$40,323.68</u>

A finance charge of 1.5% per month will be assessed
on all accounts past due 30 days.

Mister Softee Franchise LLC
901 E. Clements Bridge Road
Runnemede NJ 08078

01/15/2015

Account No: 1300-73M

Invoice No: 51144

Attn: John Conway

18

Dimitrios "Jimmy" Tsirkos

Previous Balance

\$41,783.68

Fees

			Rate	Hours	
12/01/2014	FR	Email to and from opposing counsel.	340.00	0.30	102.00
12/02/2014	FR	Telephone with opposing counsel; Draft notices of deposition to witnesses; Research witness addresses.	340.00	3.20	1,088.00
12/03/2014	FR	Draft letter to court re: discovery issues; Several emails to and from opposing counsel.	340.00	1.60	544.00
12/04/2014	JZ	Prepare for depositions; Attention to Softee truck in Manhattan operating by J.T.	400.00	0.50	200.00
	FR	Several emails to and from opposing counsel; Research subpoena issues; Telephone with and email to and from Michael Paul; Telephone with opposing counsel.	340.00	2.00	680.00
12/05/2014	FR	Draft subpoenas; Email to and from opposing counsel; Email to and from U. S. Marshal's office.	340.00	2.30	782.00
12/08/2014	GK	Telephone with U.S. Marshal re: service of additional writs.	325.00	0.10	32.50
	JZ	Attention to execution on 97k judgment; Correspondence with Judge Swain; Attention to discovery issues.	400.00	1.00	400.00
	FR	Review discovery responses; Email to and from opposing counsel.	340.00	1.20	408.00
12/09/2014	FR	Telephone with Panza and Sons; Review Discovery responses.	340.00	0.80	272.00
12/10/2014	GK	Correspondence with U.S. Marshal re: service of Writ on additional banks and expiration of Writ.	325.00	0.20	65.00
12/11/2014	JZ	Prepare for depositions.	400.00	0.40	160.00
	FR	Email to client.	340.00	0.30	102.00
	FR	Telephone with Panza and Sons attorney.	340.00	0.10	34.00
	FR	Prepare for depositions.	340.00	4.70	1,598.00
	FR	Several emails to and from opposing counsel.	340.00	0.40	136.00
12/12/2014	GK	Telephone with Santander legal department re: status of Writ. (no charge)		0.20	n/c
	FR	Depositions of witnesses; Email to and from opposing counsel; Prepare for depositions; Conference with opposing counsel.	340.00	6.50	2,210.00
12/15/2014	FR	Telephone with opposing counsel; Email to client; Prepare deposition outline; Review file.	340.00	2.00	680.00
12/16/2014	GK	Telephone with Santander Bank re: status of Writ and Tsirkos accounts. (no charge)		0.20	n/c
	FR	Email to and from Panza and Sons Attorney re: subpoenas.	340.00	0.30	102.00

Mister Softee Franchise LLC

01/15/2015

Account No: 1300-73M

Invoice No: 51144

Dimitrios "Jimmy" Tsirkos

19

			Rate	Hours	
12/17/2014	GK	Telephone with Santander Bank legal department re: status of writ and Tsirkos accounts; Telephone with branch manager re: same.	325.00	0.50	162.50
	FR	Review documents produced by Panza and Sons in response to subpoena.	340.00	1.80	612.00
12/18/2014	FR	Telephone with Panza attorney; Telephone with client.	340.00	0.20	68.00
12/19/2014	FR	Review transcripts; Review discovery responses; Email to client.	340.00	2.30	782.00
12/22/2014	GK	Correspondence with US Marshal re: service of writ on Santander. (no charge)		0.20	n/c
	GK	Review response to writ of execution from Santander.	325.00	0.10	32.50
	FR	Review deposition transcripts.	340.00	1.80	612.00
	FR	Email to opposing counsel; Telephone with court.	340.00	0.30	102.00
12/23/2014	FR	Several emails to and from opposing counsel; Review letter from opposing counsel.	340.00	0.60	204.00
12/29/2014	FR	Review discovery documents produced; Letter to opposing counsel; Several emails to and from opposing counsel.	340.00	3.20	1,088.00
12/30/2014	FR	Review discovery documents produced by Jimmy.	340.00	2.00	680.00
	FR	Letter to opposing counsel.	340.00	1.00	340.00
	FR	Several emails to and from opposing counsel.	340.00	0.30	102.00
		For Current Services Rendered		42.00	14,380.50

Expenses

10/31/2014	• Filing Fee: American Express - Courts/USDC-NY-State	200.00
11/24/2014	• Overnight Delivery/Messenger Services: It's DONE! Courier - Invoice # 26+44	390.00
12/01/2014	• Online Legal Research: Thomson Reuters - West - Invoice #830797025	63.34
12/01/2014	• Online Legal Research: Thomson Reuters - West - Invoice #830797025	670.31
12/08/2014	• Overnight Delivery/Messenger Services: It's DONE! Courier - Process Service of three subpoena - Invoice # 2707	585.00
12/10/2014	• Overnight Delivery/Messenger Services: Worldwide Express - Invoice # 1412032304	17.33
12/15/2014	• Overnight Delivery/Messenger Services: It's DONE! Courier - Invoice #2731	96.00
12/19/2014	• Transcription fees: Pirozzi & Hillman - Invoice # 24604	887.30
	Total Expenses	2,909.28
	Total Current Work	17,289.78
	Balance Due	<u>\$59,073.46</u>

A finance charge of 1.5% per month will be assessed
on all accounts past due 30 days.

Mister Softee Franchise LLC
901 E. Clements Bridge Road
Runnemede NJ 08078

02/18/2015

Account No: 1300-73M

Invoice No: 52239

Attn: John Conway

20

Dimitrios "Jimmy" Tsirkos

Previous Balance

\$59,073.46

Fees

			Rate	Hours	
01/05/2015	FR	Email to and from client.	365.00	0.60	219.00
01/06/2015	FR	Prepare for hearing; Several emails to and from opposing counsel; Review letter from opposing counsel.	365.00	1.80	657.00
01/07/2015	FR	Review letter from opposing counsel and discovery response.	365.00	1.00	365.00
01/08/2015	FR	Several calls to and from opposing counsel.	365.00	0.30	109.50
	FR	Review and summarize deposition transcripts.	365.00	0.80	292.00
01/09/2015	FR	Research discovery issue; Letters to court.	365.00	2.00	730.00
	PL	Research into discovery case law.	150.00	1.40	210.00
01/12/2015	JZ	Attention to hearing and sanctions for Tsirkos' lawyer's failure to appear; Attention to attempts to settle.	425.00	0.40	170.00
	FR	Draft affidavit; Draft letter to court; Several emails to and from opposing counsel.	365.00	2.40	876.00
01/13/2015	JZ	Attention to Tsirkos sanctions.	425.00	0.80	340.00
	FR	Draft letter to court; Review discovery.	365.00	1.30	474.50
01/14/2015	FR	Telephone with client; Prepare for deposition.	365.00	0.40	146.00
01/15/2015	FR	Research issues for hearing re: discovery deficiencies; Telephone with opposing counsel; Several emails to and from opposing counsel.	365.00	2.50	912.50
	JZ	Attention to January 20 hearing.	425.00	0.20	85.00
01/19/2015	JZ	Attention to discovery and tax return issues.	425.00	0.40	170.00
	FR	Prepare for hearing; Review letter from opposing counsel; Review discovery responses from Tsirkos.	365.00	3.40	1,241.00
01/20/2015	FR	Court appearance; Travel; Telephone with opposing counsel; Email to and from client.	365.00	4.30	1,569.50
01/21/2015	FR	Several emails to and from opposing counsel.	365.00	1.00	365.00
01/22/2015	FR	Several emails to and from opposing counsel.	365.00	0.50	182.50
01/23/2015	FR	Prepare for deposition; email to and from opposing counsel.	365.00	2.50	912.50
01/26/2015	FR	Several emails to and from opposing counsel; Prepare for deposition.	365.00	1.40	511.00
	JZ	Attention to deposition issues.	425.00	0.20	85.00

02/18/2015

Account No: 1300-73M

Invoice No: 52239

Dimitrios "Jimmy" Tsirkos

21

			Rate	Hours	
01/27/2015	FR	Draft deposition notice; Several emails to and from opposing counsel; Email to client.	365.00	2.00	730.00
	JZ	Attention to sanction on Tsirkos' lawyer.	425.00	0.20	85.00
01/28/2015	FR	Several emails to and from opposing counsel; Draft letter to court; Telephone with the court.	365.00	1.80	657.00
01/29/2015	FR	Review court order.	365.00	0.20	73.00
	JZ	Attention to depositions and Tsirkos contempt motion.	425.00	0.50	212.50
		For Current Services Rendered		34.30	12,380.50

Expenses

12/31/2014	• Search Fees: Thomson Reuters - West - Invoice # 830983211	172.22
12/31/2014	• Search Fees: Thomson Reuters - West - Invoice # 830983211	221.63
12/31/2014	• Search Fees: Thomson Reuters - West - Invoice # 830983211	2,328.65
01/05/2015	• Travel Expense: American Express - Amtrak	344.00
01/07/2015	• Overnight Delivery/Messenger Services: Worldwide Express - Invoice #1501000846	8.94
01/07/2015	• Overnight Delivery/Messenger Services: Worldwide Express - Invoice #1501000846	17.88
	Total Expenses	3,093.32

Total Current Work 15,473.82

Balance Due \$74,547.28

A finance charge of 1.5% per month will be assessed
on all accounts past due 30 days.

21

Mister Softee Franchise LLC
901 E. Clements Bridge Road
Runnemede NJ 08078

03/17/2015

Account No: 1300-73M

Invoice No: 52606

Attn: John Conway

22

Dimitrios "Jimmy" Tsirkos

Previous Balance

\$74,547.28

Fees

			Rate	Hours	
02/02/2015	FR	Draft subpoena for Tommy Dalegeorges.	365.00	0.40	146.00
02/03/2015	FR	Preparation for deposition of Tsirkos; Email to client; Emails to and from opposing counsel.	365.00	3.50	1,277.50
	FR	Review documents produced by Tsirkos.	365.00	1.00	365.00
02/04/2015	FR	Attend deposition of Tsirkos; Review email from opposing counsel.	365.00	6.50	2,372.50
02/05/2015	JZ	Attention to collection on judgment and deposition.	425.00	0.60	255.00
	FR	Email to client re: Jimmy's deposition.	365.00	2.00	730.00
02/09/2015	FR	Research discovery deficiencies.	365.00	2.10	766.50
02/10/2015	FR	Review discovery produced and research issues related to defendants failure to produce documents.	365.00	1.80	657.00
02/12/2015	FR	Draft email to client; Research contractual limitation on claims issue.	365.00	1.50	547.50
02/13/2015	FR	Email to opposing counsel.	365.00	0.30	109.50
	FR	Review deposition transcripts.	365.00	1.80	657.00
02/16/2015	FR	Review transcripts.	365.00	3.50	1,277.50
02/17/2015	FR	Summarize deposition of Tsirkos.	365.00	2.00	730.00
	FR	Several emails to and from opposing counsel.	365.00	0.50	182.50
02/18/2015	FR	Prepare for deposition; Emails to and from opposing counsel.	365.00	0.80	292.00
02/19/2015	FR	Depositions of Ray's partners	365.00	0.50	182.50
02/20/2015	FR	Review transcripts from deposition of witnesses and from defendant.	365.00	2.80	1,022.00
02/23/2015	FR	Draft subpoena to accountant; Telephone with opposing counsel; Email to and from opposing counsel.	365.00	1.00	365.00
02/25/2015	GK	Research procedure for service of subpoena on corporation.	350.00	0.60	210.00
	GK	Draft revised subpoena for service on Tsirkos accountant.	350.00	0.20	70.00
02/26/2015	GK	Correspondence with local counsel re: subpoena served on Tsirkos accountant.	350.00	0.10	35.00
	GK	Research procedure for continuing pre trial dates.	350.00	0.40	140.00
	GK	Draft revised proposed scheduling order.	350.00	0.30	105.00
	GK	Telephone and correspondence with Tsirkos' counsel re: revised proposed scheduling order.	350.00	0.20	70.00

Mister Softee Franchise LLC

03/17/2015

Account No: 1300-73M

Invoice No: 52606

Dimitrios "Jimmy" Tsirkos

23

		Rate	Hours	
	GK	Review deposition transcript of Dimitrios Tsirkos.	350.00	1.20 420.00
02/27/2015	GK	Telephone with orders and judgments clerk re: submitting proposed scheduling order.	350.00	0.10 35.00
	GK	Research S.D.N.Y. local rules re: extending deadlines.	350.00	0.30 105.00
	GK	Research Judge Swain standard operating procedures re: extending deadlines.	350.00	0.20 70.00
	GK	Draft motion to extend deadlines.	350.00	1.40 490.00
	GK	Telephone and correspondence with defendants counsel re: motion to extend deadlines.	350.00	0.30 105.00
	GK	Draft subject matter index of Jimmy Tsirkos deposition for purposes of preparing summary judgment motion.	350.00	0.90 315.00
	FR	Email to and from opposing counsel; Review letter to court; Email to court.	365.00	0.80 292.00
		For Current Services Rendered		39.60 14,397.00

Expenses

01/07/2015	↓	Online Legal Research: Pacer Service Center - Invoice# 2586723-Q42014	3.10
01/07/2015		Online Legal Research: Pacer Service Center - Invoice# 2586723-Q42014	4.50
01/07/2015		Online Legal Research: Pacer Service Center - Invoice# 2586723-Q42014	1.90
01/07/2015		Online Legal Research: Pacer Service Center - Invoice# 2586723-Q42014	4.30
01/07/2015		Online Legal Research: Pacer Service Center - Invoice# 2586723-Q42014	6.20
01/07/2015		Online Legal Research: Pacer Service Center - Invoice# 2586723-Q42014	2.80
01/07/2015		Online Legal Research: Pacer Service Center - Invoice# 2586723-Q42014	1.80
01/07/2015		Online Legal Research: Pacer Service Center - Invoice# 2586723-Q42014	1.90
01/07/2015		Online Legal Research: Pacer Service Center - Invoice# 2586723-Q42014	1.90
01/07/2015		Online Legal Research: Pacer Service Center - Invoice# 2586723-Q42014	4.30
01/07/2015		Online Legal Research: Pacer Service Center - Invoice# 2586723-Q42014	3.90
01/07/2015		Online Legal Research: Pacer Service Center - Invoice# 2586723-Q42014	2.10
01/07/2015		Online Legal Research: Pacer Service Center - Invoice# 2586723-Q42014	1.80
01/07/2015		Online Legal Research: Pacer Service Center - Invoice# 2586723-Q42014	1.90
01/07/2015		Online Legal Research: Pacer Service Center - Invoice# 2586723-Q42014	16.80
01/07/2015		Online Legal Research: Pacer Service Center - Invoice# 2586723-Q42014	1.10
01/07/2015		Online Legal Research: Pacer Service Center - Invoice# 2586723-Q42014	0.20
01/07/2015		Online Legal Research: Pacer Service Center - Invoice# 2586723-Q42014	6.80
02/03/2015		• Thomas Dalageorgos - Witness fee	20.00
02/24/2015		• Transcription fees: Ace Reporters, Inc. - Invoice # 30803	782.25
		Total Expenses	869.55
		Total Current Work	15,266.55
		Balance Due	<u>\$89,813.83</u>

A finance charge of 1.5% per month will be assessed
on all accounts past due 30 days.

Mister Softee Franchise LLC
901 E. Clements Bridge Road
Runnemede NJ 08078

04/06/2015

Account No: 1300-73M

Invoice No: 52721

Attn: John Conway

24

Dimitrios "Jimmy" Tsirkos

Previous Balance

\$89,813.83

Fees

			Rate	Hours	
03/02/2015	GK	Digest Jimmy Tsirkos dep. for Summary Judgment Motion.	350.00	0.60	210.00
	GK	Legal research re: Summary Judgment Motion.	350.00	2.10	735.00
	GK	Review 5/7/2014 Tsirkos deposition for Summary Judgment Motion.	350.00	0.60	210.00
	FR	Email to and from client.	365.00	0.20	73.00
03/03/2015	GK	Continued legal research for Summary Judgment Motion.	350.00	0.30	105.00
	JZ	Discovery and tax return issues.	425.00	0.30	127.50
	FR	Email to client.	365.00	0.50	182.50
03/04/2015	GK	Review deposition of Dimitrios Tzanavalos for purposes of preparing subject matter index for summary judgment motion.	350.00	0.50	175.00
	GK	Continue preparing subject matter index for Jimmy Tsirkos deposition for summary judgment motion.	350.00	1.30	455.00
	GK	Analyze issues re: tax returns to be provided by Tsirkus accountant pursuant to subpoena for contempt motion.	350.00	0.30	105.00
	GK	Review complaint; Answer with counterclaims, motions, affidavits, correspondence, etc. for purposes of outlining/preparing summary judgment notice.	350.00	2.80	980.00
	JZ	Attention to discovery issues.	425.00	1.00	425.00
03/05/2015	GK	Review and analyze MSQ Franchise Agreement for purposes of preparing Summary Judgment Motion.	350.00	0.70	245.00
	GK	Draft deposition digest - Dimitrios Tzanavalos for summary judgment motion.	350.00	1.40	490.00
03/06/2015	GK	Review Kiki Tsirkos deposition for summary judgment motion.	350.00	0.60	210.00
	GK	Continue deposition digest of Dimitrios Tzanavalos.	350.00	0.20	70.00
	GK	Review Dimitrios Konstantakakos deposition.	350.00	0.40	140.00
	GK	Review Thomas Delageorgos Deposition.	350.00	0.80	280.00
	GK	Draft subject matter index - Tsirkos deposition (5/7/2014).	350.00	1.00	350.00
03/09/2015	GK	Review deposition of Thomas Fotinakopoulos.	350.00	0.90	315.00
	JZ	Attention to discovery issues re: accountant.	425.00	0.30	127.50
03/10/2015	GK	Draft Caroline Tsirkos 2/4/15 deposition digest for summary judgment motion.	350.00	0.80	280.00
	GK	Draft Thomas Fotinakopoulos deposition digest for purposes of preparing summary judgment motion.	350.00	1.00	350.00
03/11/2015	GK	Research procedure for enforcing subpoena against non-party (Tsirkos' accountant); Contempt.	350.00	0.80	280.00
	GK	Research no genuine issue of material fact as to damages as basis for summary judgment motion.	350.00	1.80	630.00
	GK	Research contempt issues	350.00	1.30	455.00
	GK	Draft deposition digest: Kiki Tsirkos.	350.00	0.40	140.00

Mister Softee Franchise LLC

04/06/2015

Account No: 1300-73M

Invoice No: 52721

Dimitrios "Jimmy" Tsirkos

25

			Rate	Hours	
	FR	Telephone call with Tsirkos' accountant; Telephone with opposing counsel and email to and from opposing counsel.	365.00	0.60	219.00
03/12/2015	GK	Draft order to show cause and contempt motion.	350.00	2.10	735.00
	GK	Review Ray Amanollahi disposition transcript.	350.00	1.30	455.00
	FR	Research conference motion issues; Email to and from opposing counsel; Review documents from accountant.	365.00	1.80	657.00
03/13/2015	GK	Continue drafting motion for contempt against Eracleous Accounting.	350.00	0.40	140.00
	FR	Email to and from opposing counsel.	365.00	0.20	73.00
03/16/2015	GK	Attention to summary judgment outline; Potential legal and factual issues.	350.00	0.50	175.00
	JZ	Review tax returns produced by accountant.	425.00	0.40	170.00
	FR	Prepare motion for contempt against accountant.	365.00	0.70	255.50
	FR	Email to client; Outline summary judgment motion.	365.00	1.60	584.00
03/17/2015	JZ	Draft contempt motion against Tsirkos' accountant.	425.00	0.50	212.50
	GK	Contempt motion against Tsirkos' accountant.	350.00	0.40	140.00
03/18/2015	JZ	Review Tsirkos' lawyer's motion to withdraw as counsel; Attention to summary judgment.	425.00	0.30	127.50
	FR	Email to and from opposing counsel ; Review motion to withdraw; Prepare opposition to motion; Telephone with opposing counsel.	365.00	4.70	1,715.50
03/19/2015	GK	Research grounds for opposing motion for leave to withdraw as counsel.	350.00	0.80	280.00
	GK	Finalized contempt motion against accountant; Prepared Exhibits and cover sheet.	350.00	2.10	735.00
	FR	Draft opposition to withdraw motion.	365.00	1.00	365.00
03/20/2015	FR	Review order; Email to client.	365.00	0.50	182.50
03/23/2015	JZ	Attention to counsel issue.	425.00	0.20	85.00
	FR	Telephone with local counsel re: contempt motion against accountant.	365.00	0.30	109.50
03/24/2015	JZ	Attention to Tsirkos' attempt to depose Softee.	425.00	0.20	85.00
03/26/2015	FR	Attention to service of motion for contempt court order; Email to client and Tsirkos' accountant with motion for contempt; Email to and from local counsel re: contempt motion.	365.00	1.80	657.00
03/27/2015	FR	Several telephone calls with accountant's attorney; Emails to and from local counsel.	365.00	1.20	438.00
03/30/2015	JZ	Attention to sanctions against Tsirkos' accountant.	425.00	0.30	127.50
	FR	Several emails to and from accountant's attorney and local counsel; Telephone with accountant's attorney.	365.00	0.50	182.50
03/31/2015	FR	Several emails to and from local counsel re: contempt motion against the accountant.	365.00	0.20	73.00
		For Current Services Rendered		47.50	17,124.50

Mister Softee Franchise LLC
901 E. Clements Bridge Road
Runnemede NJ 08078

05/13/2015

Account No: 1300-73M

Invoice No: 53419

Attn: John Conway

26

Dimitrios "Jimmy" Tsirkos

Previous Balance

\$108,504.25

Fees

			Rate	Hours	
04/02/2015	JZ	Attention to summary judgment motion.	425.00	0.40	170.00
	FR	Email to client.	365.00	0.40	146.00
	GK	Conference with Frank Reino re: outline for summary judgment motion. (NO CHARGE)		0.30	n/c
04/06/2015	FR	Emails to and from local counsel and accountant's counsel.	365.00	0.30	109.50
04/07/2015	FR	Several emails to and from local counsel.	365.00	0.30	109.50
04/08/2015	FR	Several emails to and from local counsel and accountant's counsel.	365.00	0.30	109.50
04/10/2015	FR	Email to and from local counsel; Telephone with accountant's attorney.	365.00	0.60	219.00
04/13/2015	FR	Email to and from local counsel and accountant attorney.	365.00	0.30	109.50
04/16/2015	FR	Email to and from local counsel.	365.00	0.20	73.00
04/22/2015	FR	Letter to client.	365.00	0.20	73.00
04/23/2015	JZ	Update re: accountant's subpoena response.	425.00	0.20	85.00
04/24/2015	FR	Email to and from accountant's attorney; review documents produced by accountant's attorney.	365.00	1.60	584.00
04/27/2015	JZ	Draft motion for default judgment.	425.00	0.20	85.00
	FR	Research default issue; Draft default motion; Email to client; Several emails to and from accountant's attorney; Review tax return documents.	365.00	5.70	2,080.50
04/28/2015	GK	research re: service of subpoena; Prepare bank subpoenas for Tsirkos' wife in aid of execution on judgment; Prepare interrogatories in aid of execution to banks.	350.00	0.90	315.00
04/29/2015	FR	Draft motion for default.	365.00	5.50	2,007.50
04/30/2015	JZ	Draft motion for default judgment.	425.00	0.90	382.50
	FR	Emails to and from local counsel and accountant's counsel; Edit motion for default.	365.00	1.40	511.00
	GK	Prepare discovery in aid of execution directed to banks used by Tsirkos' wife for purposes of collecting on 2014 judgment.	350.00	1.80	630.00
		For Current Services Rendered		21.20	7,799.50

05/13/2015

Mister Softee Franchise LLC

Account No: 1300-73M

Invoice No: 53419

Dimitrios "Jimmy" Tsirkos

27

Expenses

03/27/2015	• Travel Expense: American Express - Amtrak Internet	308.00
04/01/2015	• Overnight Delivery/Messenger Services: Worldwide Express - Invoice # 1504000878	41.48
04/01/2015	• Online Legal Research: Thomson Reuters - West - Invoice # 831534061	824.81
04/01/2015	• Online Legal Research: Thomson Reuters - West - Invoice # 831534061	256.31
04/06/2015	• Travel Expense: American Express - Amtrak Internet	344.00
04/06/2015	• Online Legal Research: Pacer Service Center - Invoice # 2586723-Q12015	75.40
	Total Expenses	1,850.00
03/30/2015	• Travel Expense: American Express - Amtrak Internet	-294.40
04/06/2015	• Travel Expense: American Express - Amtrak Internet	-344.00
	Total Credits for Expenses	-638.40
	Total Current Work	9,011.10

Payments

Total Payments for 04/22/2015	-526.50
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Balance Due	<u>\$116,988.85</u>
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A finance charge of 1.5% per month will be assessed
on all accounts past due 30 days.

Mister Softee Franchise LLC
901 E. Clements Bridge Road
Runnemede NJ 08078

Page: 1
06/08/2015
Account No: 1300-73M
Invoice No: 53816

Attn: John Conway

28

Dimitrios "Jimmy" Tsirkos

Previous Balance

\$116,988.85

Fees

			Rate	Hours	
05/01/2015	JZ	Attention to accountant - sanction issue.	425.00	0.30	127.50
	FR	Several emails to and from local counsel and lawyer for Tsirkos' accountant.	365.00	0.90	328.50
05/04/2015	FR	Email to and from opposing counsel; Draft motion for entry of default.	365.00	3.60	1,314.00
05/05/2015	FR	Draft default judgment motion; Email to and from opposing counsel.	365.00	2.70	985.50
05/06/2015	FR	Review bank records; Telephone with several of Tsirkos' banks.	365.00	1.30	474.50
05/07/2015	FR	Email to client.	365.00	0.20	73.00
05/08/2015	FR	Review order from court; Email to client.	365.00	0.90	328.50
05/11/2015	JZ	Draft default judgment motion.	425.00	0.80	340.00
	FR	Draft default judgment motion.	365.00	5.00	1,825.00
05/12/2015	FR	Draft motion for default judgment; Several emails and telephone with Santander Bank re: execution efforts.	365.00	5.50	2,007.50
05/13/2015	FR	Several emails to and from Santander Bank re: bank records.	365.00	0.60	219.00
	FR	Draft default motion; Research future royalties argument.	365.00	3.40	1,241.00
05/15/2015	FR	Attention to default; Email to and from accountant's attorney.	365.00	3.00	1,095.00
05/18/2015	JZ	Telephone with Tsirkos' new lawyer re: settlement.	425.00	0.20	85.00
	GK	Research re: procedure for obtaining Charging Order in New York to execute on Tsirkos' LLCs.	350.00	1.10	385.00
	FR	Telephone with client; Email to and from clients; Draft default judgment motion; Email to and from accountant's attorney and local counsel.	365.00	4.80	1,752.00
05/19/2015	FR	Telephone with bank re: subpoenas; Edit affidavit for summary judgment.	365.00	0.90	328.50
05/20/2015	JZ	Draft motion for default judgment.	425.00	2.00	850.00
05/21/2015	FR	Edit default judgment motion; Letter to court; Telephone with client.	365.00	3.70	1,350.50
	GK	Continue legal research re: procedure for obtaining charging order in New York.	350.00	0.40	140.00
05/22/2015	FR	Email to and from accountant's attorney.	365.00	0.30	109.50
05/26/2015	FR	Email to and from local counsel and banks re: subpoenas.	365.00	0.80	292.00

Mister Softee Franchise LLC

06/08/2015

Account No: 1300-73M

Invoice No: 53816

Dimitrios "Jimmy" Tsirkos

29

			Rate	Hours	
05/27/2015	JZ	Research plate numbers and tie trucks to Tsirkos.	425.00	0.20	85.00
	GK	Review bank records of Tsirkos' wife from Santander for purposes of executing on judgment.	350.00	0.30	105.00
	FR	Review emails from client and telephone with private investigator; Review bank records from Santander.	365.00	1.80	657.00
05/28/2015	FR	Several emails to and from counsel for accountant.	365.00	0.20	73.00
	FR	Email to and from client.	365.00	0.20	73.00
		For Current Services Rendered		45.10	16,644.50

Expenses

05/01/2015	•	Online Legal Research: Thomson Reuters - West - Invoice # 831713555		710.28
05/01/2015	•	Online Legal Research: Thomson Reuters - West - Invoice # 831713555		211.33
05/11/2015	•	Overnight Delivery/Messenger Services: It's DONE! Courier - Invoice # 3542		585.00
05/13/2015	•	Overnight Delivery/Messenger Services: Worldwide Express - Invoice # 1505034978		34.52
		Total Expenses		1,541.13
		Total Current Work		18,185.63
		Balance Due		<u>\$135,174.48</u>

A finance charge of 1.5% per month will be assessed
on all accounts past due 30 days.

Mister Softee Franchise LLC
901 E. Clements Bridge Road
Runnemede NJ 08078

07/15/2015
Account No: 1300-73M
Invoice No: 54157

Attn: John Conway

30

Dimitrios "Jimmy" Tsirkos

Previous Balance

\$135,174.48

Fees

			Rate	Hours	
06/01/2015	FR	Letter to client. (NO CHARGE)		0.60	n/c
06/02/2015	FR	Edit default judgment motion; Several emails to and from local counsel.	365.00	1.60	584.00
06/04/2015	FR	Letter to court; File motion for default; Draft certificate of service for order.	365.00	1.00	365.00
06/05/2015	FR	Email to client. (NO CHARGE)		0.50	n/c
06/12/2015	JZ	Telephone with Gilberto LaBoy re: evidence tying Tsirkos to operating trucks.	425.00	0.20	85.00
06/15/2015	JZ	Analysis of NY Ice Cream truck playing Softee jingle and using Softee colors and decals.	425.00	0.20	85.00
	FR	Several emails to and from bank re: subpoena.	365.00	0.40	146.00
06/16/2015	GK	Legal research re: procedure and basis for executing on membership interest in LLC and appointing receiver for purposes of executing on Tsirkos judgment.	350.00	4.30	1,505.00
06/22/2015	JZ	Follow up with P.I.	425.00	0.30	127.50
06/29/2015	JZ	Attention to execution on assets.	425.00	0.20	85.00
	GK	Legal research re: procedure for executing on and selling/assuming LLC membership interests; Legal research re: reporting tax violations to IRS and using report in civil action; Email report to client re: execution, collection status and procedure, bankruptcy and tax issues. (NO CHARGE)		6.00	n/c
06/30/2015	GK	Continue preparing analysis of reporting of tax violations/execution procedure for taking Tsirkos' interests in LLCs. (NO CHARGE)		1.20	n/c
		For Current Services Rendered		8.20	2,982.50

Expenses

06/01/2015	Online Legal Research: Thomson Reuters - West - Invoice # 831899091	795.90
06/10/2015	Overnight Delivery/Messenger Services: Worldwide Express - Invoice # 1506033954	17.82
06/10/2015	Overnight Delivery/Messenger Services: Worldwide Express - Invoice # 1506033954	24.23
	Total Expenses	837.95
	Total Current Work	3,820.45

Mister Softee Franchise LLC

07/15/2015

Account No: 1300-73M

Invoice No: 54157

Dimitrios "Jimmy" Tsirkos

31

Balance Due

\$138,994.93

A finance charge of 1.5% per month will be assessed
on all accounts past due 30 days.

10/13/2015

Mister Softee Franchise LLC
901 E. Clements Bridge Road
Runnemede NJ 08078

Account No: 1300-73M

Invoice No: 55501

Attn: John Conway

32

Dimitrios "Jimmy" Tsirkos

Previous Balance

\$113,459.20

Fees

			Rate	Hours	
09/01/2015	GK	Final edit to motion for installment payment order and certifications; Prepare exhibits. (No charge)		2.00	n/c
	FR	Emails to and from bank re: subpoena.	365.00	0.40	146.00
	FR	Draft contempt motion against Nektoria Otta-Tsirkos.	365.00	2.20	803.00
09/02/2015	GK	Finalize and file motion for entry of installment payment order. (No charge)		3.00	n/c
	FR	Draft contempt motion against Nektoria Tsirkos; Emails to and from bank re: subpoena.	365.00	1.80	657.00
09/03/2015	JZ	Draft contempt motion against Tsirkos' wife for failing to appear at deposition.	425.00	0.40	170.00
09/04/2015	FR	Edit Otta contempt motion; Email to and from local counsel.	365.00	0.80	292.00
09/10/2015	FR	Email to and from Alma Bank.	365.00	0.20	73.00
09/11/2015	FR	Review bank production subpoena re: Otta contempt; Edit contempt motion.	365.00	1.00	365.00
	FR	Several emails to and from local counsel.	365.00	0.80	292.00
09/15/2015	FR	Email to and from Alma Bank and Santander Bank re: subpoena.	365.00	0.50	182.50
09/18/2015	FR	Review bank records produced by Alma, Santander, and Citi banks; Research options to garnish Tsirkos' wife's accounts; Several emails to and from local counsel.	365.00	4.20	1,533.00
09/21/2015	JZ	Attention to case against Tsirkos' wife to collect on judgment.	425.00	0.40	170.00
	FR	Email to and from local counsel; Review court order re: Otta contempt.	365.00	0.50	182.50
09/22/2015	JZ	Attention to suit against Tsirkos' wife.	425.00	0.40	170.00
	FR	Email to client re: Otta contempt hearing; Attention to service of motion.	365.00	0.50	182.50
09/24/2015	FR	Review bank records.	365.00	1.00	365.00
09/29/2015	FR	Email to and from Private Investigator; Attention to inspection.	365.00	0.50	182.50
		For Current Services Rendered		15.60	5,766.00

Expenses

07/07/2015	• Online Legal Research: Pacer Service Center - Invoice #2586723-Q22015	10.00
08/17/2015	• Overnight Delivery/Messenger Services: It's Done! Courier - Invoice #4112	248.00
08/21/2015	• Transcription fees: Pirozzi & Hillman - Invoice # 25081	299.30

Mister Softee Franchise LLC

10/13/2015

Account No: 1300-73M

Invoice No: 55501

Dimitrios "Jimmy" Tsirkos

33

08/24/2015	• Overnight Delivery/Messenger Services: It's DONE! Courier - Invoice # 4185	246.00
08/24/2015	• Overnight Delivery/Messenger Services: It's DONE! Courier - Invoice # 4185	75.00
08/24/2015	• Overnight Delivery/Messenger Services: It's DONE! Courier - Invoice # 4185	75.00
08/24/2015	• Overnight Delivery/Messenger Services: It's DONE! Courier - Invoice # 4185	235.00
09/01/2015	• Online Legal Research: Thomson Reuters - West - Invoice # 832449776	2,532.88
09/01/2015	• Online Legal Research: Thomson Reuters - West - Invoice # 832449776	61.54
09/09/2015	• Overnight Delivery/Messenger Services: Worldwide Express - Invoice # 1509034786	29.50
09/17/2015	• Filing Fee: Citi Subpoena Complaine Unit - Invoice # 3701203	155.08
09/17/2015	• Processor Fee: Santander Bank, N.A.	146.50
09/21/2015	• Photocopy Charges: Document Technologies, Inc. - Invoice # 899030	768.08
09/28/2015	• Overnight Delivery/Messenger Services: It's DONE! Courier - Invoice # 4370	248.00
	Total Expenses	5,129.88
	Total Current Work	10,895.88
	Balance Due	<u>\$124,355.08</u>

A finance charge of 1.5% per month will be assessed
on all accounts past due 30 days.



21 South 21st Street Philadelphia, PA 19103
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34

Mister Softee Franchise LLC
 901 E. Clements Bridge Road
 Runnemede NJ 08078

Page: 1
 12/16/2015
 Account No: 1300-73M
 Invoice No: 57140

Attn: John Conway

Dimitrios "Jimmy" Tsirkos

Previous Balance \$144,762.13

Fees

			Rate	Hours	
11/03/2015	GK	Assist with prep for deposition of Tsirkos' son in aid of execution.	350.00	0.90	315.00
	FR	Review deposition of Nektoria Otta; Prepare for deposition of Lazaros Tsirkos.	365.00	4.00	1,460.00
11/04/2015	FR	Travel. (No Charge)		3.00	n/c
	FR	Attend deposition of Lazaros Tsirkos; Telephone with Lazaros Tsirkos and Jimmy's attorney	365.00	2.20	803.00
	FR	Email to and from Jimmy's attorney re: settlement offer; Review letter from Jimmy's attorney.	365.00	0.40	146.00
11/05/2015	FR	Email to and from Jimmy's attorney; Draft contempt motion against Lazaros Tsirkos.	365.00	3.50	1,277.50
11/06/2015	FR	Email to and from Jimmy's attorney; Review transcript from deposition of Jimmy's wife; Several emails to and from client; Letter to Astralease re: subpoena response; Draft contempt motion.	365.00	5.20	1,898.00
11/10/2015	JZ	Attention to settlement offer.	425.00	0.20	85.00
	FR	Emails to and from client re: Lazaros Tsirkos deposition. (No Charge)		0.50	n/c
11/11/2015	FR	Review documents produced by Astralease; Email to and from client; Several emails to and from private investigator re: registration records for trucks owned by Jimmy's wife.	365.00	3.80	1,387.00
11/12/2015	FR	Several emails to and from private investigator re: two trucks registered to Tsirkos and his wife; Review registration records.	365.00	0.70	255.50

Mister Softee Franchise LLC

Dimitrios "Jimmy" Tsirkos

Page: 2
12/16/2015
Account No: 1300-73M
Invoice No: 57140

35

			Rate	Hours	
11/13/2015	FR	Several emails to and from private investigator. (No Charge)		0.50	n/c
11/16/2015	FR	Several emails to and from Jimmy's attorney re: settlement of case; Email to and from local counsel re: contempt hearing.	365.00	2.00	730.00
11/17/2015	JZ	Attention to settlement.	425.00	0.20	85.00
	FR	Email to and from local counsel. (No Charge)		0.30	n/c
11/18/2015	FR	Telephone with court; Email to and from local counsel; Prepare local counsel for hearing. (No Charge)		1.80	n/c
11/19/2015	FR	Edit contempt motion; Email to and from local counsel. (No Charge)		1.60	n/c
11/20/2015	FR	Review court order. (No Charge)		0.50	n/c
11/23/2015	FR	Review letter and permit applications from NYC Parks and Recreation.	365.00	1.20	438.00
11/24/2015	FR	Review court's order and opinion; Email to client; Draft motion to release security; Review records for Parks and Recreation. (No Charge)		4.50	n/c
11/25/2015	FR	Edit motion for return of security; File motion; Letter to Tsirkos. (No Charge)		1.00	n/c
		For Current Services Rendered		24.30	8,880.00

Expenses

11/01/2015	✓	Online Legal Research; Thomson Reuters - West - Invoice # 832819989	207.56
11/03/2015	✓	Transcription fees: Pirozzi & Hillman - Invoice # 25220	834.60
11/05/2015	✓	Travel Expense: Frank Reino	336.00
11/06/2015	✓	Transcription fees: Pirozzi & Hillman - Invoice # 25230	304.75
11/09/2015	✓	Overnight Delivery/Messenger Services: Worldwide Express - Invoice # 1511069734	17.82
11/11/2015	✓	North American Investigations - Invoice # INV8091	150.00
		Total Expenses	1,850.73
		Total Current Work	10,730.73

Payments

Total Payments for 12/14/2015 -40,000.00



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36

Mister Softee Franchise LLC
 901 E. Clements Bridge Road
 Runnemede NJ 08078

Page: 1
 12/16/2015
 Account No: 1300-73M
 Invoice No: 57154

Attn: John Conway

Dimitrios "Jimmy" Tsirkos

Previous Balance \$115,492.86

Fees

			Rate	Hours		
12/01/2015	FR	Prepare fees application.	365.00	1.00	365.00	590
12/03/2015	FR	Telephone with court; Review court order; Email to client.	365.00	0.80	292.00	591
12/08/2015	FR	Draft fee application.	365.00	2.30	839.50	592
12/09/2015	FR	Draft fee application and supporting affidavits; Several emails to and from local counsel.	365.00	1.80	657.00	593
12/10/2015	FR	Draft fee application and supporting affidavits; Several emails to and from local counsel.	365.00	1.00	365.00	594
		For Current Services Rendered		6.90	2,518.50	

Expenses

12/01/2015	•	Online Legal Research: Thomson Reuters - West - Invoice # 833000931	12.77	250
12/01/2015	•	Online Legal Research: Thomson Reuters - West - Invoice # 833000931	843.04	251